

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Gonzalo CORDOVA

Katherine MILLER

Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 8, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 8 United States Code,
Section 1324(a)(1)(A)(iii) and
(v)(I)

Offense Description

knowingly or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, conceals, harbors, or shields from detection, attempts to conceal, harbor, or shield from detection, and conspires with other persons known and unknown to conceal, harbor, or shield from detection such alien in any place, including any building or any means of transportation;

This criminal complaint is based on these facts:

See attachment "A".

☒ Continued on the attached sheet.


Complainant's signature

Submitted by reliable electronic
means per Fed.R.Crim.P. 4.1, Micah Sublett
sworn to and signature attested
telephonically on December 10, 2021,
at Laredo, Texas.


DIANA SONG QUIROGA
UNITED STATES MAGISTRATE JUDGE

Judge

ATTACHMENT "A"

Page 1

I, Micah Sublett, a Homeland Security Investigations (HSI) Special Agent (SA), have knowledge of the following facts derived, in part, from either my personal observations, my training and experience, and/or information obtained from other agents and witnesses:

1. On December 8, 2021, a United States Border Patrol (USBP) Supervisory Border Patrol Agent (SBPA) were working his assigned duties near El Cenizo, Texas. A concerned citizen (CC) approached the SBPA and stated a vehicle was dropping off aliens at a nearby residence. The SBPA followed the CC to a residence on the 400 block of Holguin Street in El Cenizo, Texas.
2. The SBPA observed a sport utility vehicle parked at the residence under a carport and approached the SUV and identified himself as a Border Patrol Agent (BPA). The SBPA observed multiple subjects exiting the SUV and attempting to abscond by running towards the rear of the residence. The SBPA approached and observed two subjects in the SUV, a male subsequently identified as Gonzalo CORDOVA in the driver's seat and a female subsequently identified as Katherine MILLER in the front passenger's seat.
3. The SBPA heard sounds coming from the house and observed multiple subjects through an open window of the residence. A total of 64 subjects were discovered at the residence or attempting to abscond from the residence.
4. BPAs conducted immigration inspections on the subjects and determined the subjects were undocumented aliens (UDAs) from various countries. All subjects were transported to the Laredo South Border Patrol station in Laredo, Texas.
5. During a subsequent interview, MILLER stated she was a United States Citizen residing in Laredo, Texas. MILLER denied knowledge of the human smuggling event and stated a female she knows asked her to go to the residence (located on the 400 block of Holguin Street) and pick up the female's aunt. MILLER claimed when she and CORDOVA had arrived at the residence, and she knocked at the door several people exited the house and got into the vehicle. MILLER claimed she and CORDOVA had told the people to get out of the vehicle but that they had not gotten out. MILLER stated she realized the people were illegal when the USBP arrived, and she was subsequently arrested.
6. During a subsequent interview, CORDOVA stated he was a United States Citizen residing in Laredo, Texas. CORDOVA stated that a friend of MILLER's had told them to go to a house and pick up that friend's aunt. CORDOVA stated MILLER gave him directions as he drove her SUV. CORDOVA stated when they arrived at the residence, MILLER knocked at the door. CORDOVA stated approximately five people had exited

and gotten into their vehicle. CORDOVA stated he had told the people to get out of the vehicle, but the people had not gotten out. CORDOVA stated the USBP arrived, and he was arrested.

7. Two UDAs were kept as material witnesses and admitted that smuggling arrangements were made for them to be smuggled into the United States to various destinations and for various amounts of money.
8. Ingrid Victoria IBOY-Soto stated she is a citizen of Guatemala. IBOY-Soto admitted that smuggling arrangements were made for her to cross into the United States with a destination of Mississippi. IBOY-Soto stated after she crossed the Rio Grande River, she was picked up by someone in a car and taken to a house. IBOY-Soto stated there was no food at the house. IBOY-Soto stated she was falling asleep inside the house but awoke when there was noise because immigration had arrived.
9. Alberto ROJAS-Torres stated he is a citizen of Mexico. ROJAS-Torres admitted that smuggling arrangements were made for him to cross into the United States with a destination of Atlanta, Georgia. ROJAS-Torres stated after he crossed the Rio Grande River, he was picked up by someone in a car and taken to a house. ROJAS-Torres stated there was no food at the house. ROJAS-Torres stated when a vehicle had arrived at the house, he and other people exited the house and got into the vehicle. ROJAS-Torres stated the vehicle had a male in the driver's seat and a female in the front passenger seat. ROJAS-Torres stated when they got into the vehicle, the male driver told them to get in the back. ROJAS-Torres stated he and one other person got into the rear cargo portion of the SUV and three additional people got into the rear seats. ROJAS-Torres stated he and the other people were hiding in the back seat and the rear of the vehicle for a few minutes before the male driver of the vehicle told them to run because immigration was there.